

REMARKS

Independent claim 1 was rejected as being unpatentable over Goodman in view of Franz and Westerman. As amended, claim 1 calls for a keyboard to enable text entry, and a controller to detect when a processor-based system enters a text entry mode and in response to detection of the entry into the text entry mode, changing the mode of operation of a cursor to avoid inadvertent interruption of text entry.

Neither Goodman nor Franz alone or in combination teach or suggest a controller that detects when a processor-based system enters into a text entry mode and in response thereto changes the mode of operation of a cursor to avoid inadvertent interruption of text entry.

With respect to Franz, the visual appearance of a cursor changes when changing from typing mode to pointing mode and vice versa. Column 11, line 43 through column 12, line 17. Furthermore, the cursor returns to its initial position when resuming a typing mode after an implicit change to a pointing mode. Column 16, line 55 through column 17, line 45; column 18, lines 1-2. Franz's change in cursor appearance and return to initial position fail to address changing the mode of operation of a cursor to avoid inadvertent interruption of text entry. Thus, Franz fails to disclose a controller that changes the mode of operation of cursor to avoid inadvertent interruption of text entry in response to detection of the entry into a text entry mode.

Additionally, a temporary freeze of cursor motion in response to a pointing event also fails to address cursor control during text entry to avoid unwanted cursor movement. See, column 13, line 61 through column 14, line 4. For example, when Franz freezes the cursor, the keyboard is in pointing mode, not text mode. See Figure 12 boxes 170, 174 and 178 and discussion of claim 3 below. For at least these reasons, Franz fails to disclose a controller that changes the mode of operation of a cursor to avoid inadvertent interruption of text entry in response to detecting entry into a text entry mode.

Goodman fails to cure the deficiencies of Franz (and vice versa). Like Franz, Goodman fails to address cursor control to avoid inadvertent interruption of text entry. In fact, a keyword search of Goodman failed to produce the term "text entry" within Goodman. The only place where the term "text" is even used in Goodman with respect to conventional use of cursor movement keys. For example, horizontal movement is across lines of text and vertical movement is from one line of text to another. Column 3, lines 54-61. Taken together, neither

Franz nor Goodman teach or suggest every limitation of amended claim 1 alone or in combination. As such, amended claim 1 and claims dependent thereon are believed to be patentable.

With respect to claim 3, Franz is said to disclose preventing cursor movement. Paper No. 12, page 4. The temporary freeze of a cursor referred to in Column 13, line 16 though Column 14 line 4 of Franz occurs during a pointing event, which requires being in a pointing mode. See, Figure 12 boxes 170, 174 and 178; column 12, lines 18-24; column 13, lines 57-61. The reference to column 30, lines 3-14 of Franz appears to be in error. That is, Franz does not have a column 30. Thus, the citation fails to support the rejection. In sum, because Franz freezes the cursor in a pointing mode of operation Franz fails to disclose preventing cursor movement in response to detecting entry into a text entry mode. As such, claim 3 is believed to be patentable over Goodman in view of Franz.

On a similar analysis amended claims 10, 17, and 26 and respective dependent claims are also believed to be patentable over Goodman in view of Franz.

Independent claims 15 and 23 were rejected as being unpatentable over Franz in view of Paratore. As amended, claim 23 calls for a pointing device, an interface, and a controller communicatively coupled to the interface, the controller to adjust the operation of a cursor of the pointing device in response to the entry into a text-entry mode, said cursor adjustment to enable text entry without accidental interference from said pointing device.

Franz fails to disclose enabling keyboard input without accidental interference from a pointing device. Paper No. 12, p. 12. Paratore fails to cure the deficiencies of Franz. Simply, Paratore fails to address cursor control in response to entry into a text entry mode.

For example, the keyboard of Paratore's handheld computer includes a pointing device such as a touch pad, trackball or mouse. Column 3, lines 3-16. When in the keyboard input mode, the keyboard is used in a conventional manner. Column 3, lines 40-45. Thus, while in the keyboard input mode, the computer may input data with the keys of the keyboard or use the pointing device. Paratore fails to address control over the pointing device cursor in response to entry into text entry mode. Merely disabling the pen 30 when the computer enters the keyboard input mode fails to address cursor control in response to text entry.

Likewise, merely disabling the keyboard when in the pen input mode fails to address the same. For example, the pen 30 may be used to write on the display. Column 3 line 65 through

column 9, line 1. However, the display may be responsive to other input devices such as a finger. Column 4, lines 9-11. Paratore fails to disclose a mechanism that avoids input from another device while writing with the pen 30. The disabling of the keyboard is not responsive to pen input. Rather, it occurs when switch 22a is open. Column 5, lines 26-30.

Thus, neither Paratore nor Franz alone or in combination teach or suggest a controller that adjusts the operation of a cursor in response to entry into a text entry mode where cursor adjustment enables text entry without accidental interference from a pointing device. For at least these reasons, amended claim 23 and claims dependent thereon are believed to be patentable. On a similar analysis, amended claim 15 and respective dependent claims are also believed to be patentable.

In view of the amendments and remarks above, the application is believed to be in condition for allowance. The Examiner is kindly asked to pass the application to issue.

Respectfully submitted,

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